

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In re:
Brian Goodman,
Debtor.

FILED 2026 JAN 29 PM4:19
Clerk of the US Bankruptcy Court NH

Chapter 13
Case No. 25-10233-KB
Judge: Honorable Kimberly Bacher

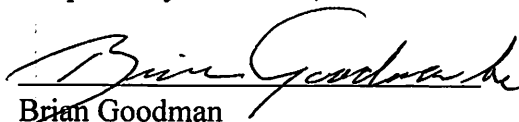
**DEBTOR'S OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC
STAY**

The Debtor, Brian Goodman, appearing pro se, objects to the Motion for Relief from Automatic Stay filed by Shellpoint Mortgage Servicing as servicer for JPMorgan Chase Bank, N.A. (ECF No. 172), and states:

1. The Debtor has filed an Amended Chapter 13 Plan currently pending before the Court.
2. The Debtor has disclosed a proposed third-party buy-out/refinance relating to 33–35 Pinecrest Circle and has sought Court supervision and approval before any closing or distribution of funds.
3. Granting relief at this time would prematurely foreclose a viable reorganization path and preempt the Court's consideration of plan feasibility and related approval issues.
4. The arrearage amounts alleged by Movant are disputed and have not been adjudicated; stay relief is a summary proceeding and not a merits determination.

WHEREFORE, the Debtor respectfully requests that the Court deny the Motion for Relief from Automatic Stay, or alternatively continue the matter pending resolution of the Debtor's Amended Plan and related filings.

Respectfully submitted,


Brian Goodman

Debtor, pro se

Dated: January 29, 2026

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DEBTOR'S OBJECTION TO MOTION FOR CO-DEBTOR RELIEF

The Debtor objects to the request for co-debtor relief under 11 U.S.C. §1301(c) contained in ECF No. 172:

1. The underlying obligation remains the Debtor's debt and is treated in the Debtor's Amended Chapter 13 Plan.
2. The Debtor disclosed the property interest and sought Court supervision; no closing has occurred.
3. Granting co-debtor relief now would effectively permit foreclosure before plan feasibility and related approval issues are decided.

WHEREFORE, the Debtor respectfully requests that the Court deny, or alternatively continue, the request for co-debtor relief.

Respectfully submitted,



Brian Goodman
Debtor, pro se

Dated: January 29, 2026

**UNITED STATES BANKRUPTCY COURT
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SUPPLEMENTAL DECLARATION OF BRIAN GOODMAN

1. I am the Debtor in this Chapter 13 case and submit this Supplemental Declaration based upon my personal knowledge.
2. I am currently proceeding pro se following the withdrawal of my prior counsel in December 2025.
3. This bankruptcy case involves multiple real properties and multiple contested motions, including the Motion for Relief from Automatic Stay and Co-Debtor Relief filed by Shellpoint Mortgage Servicing as servicer for JPMorgan Chase Bank, N.A. (ECF No. 172).
4. With respect to the property located at 33–35 Pinecrest Circle, Concord, New Hampshire, I have disclosed to the Court a proposed third-party buy-out or refinance transaction intended to fund my Amended Chapter 13 Plan and cure arrearages.
5. I sought Court supervision and approval of the proposed transaction before any closing occurred and before any funds were received or distributed.
6. As of the date of this Declaration, no closing has occurred and no proceeds have been paid to me or to any creditor.
7. This Declaration is submitted solely to provide factual context for the Court's consideration of ECF No. 172 and related objections, and not for the purpose of arguing the merits of any claim or defense.

I declare under penalty of perjury that the foregoing is true and correct.


Brian Goodman

Debtor, pro se

Dated: January 29, 2026

**UNITED STATES BANKRUPTCY COURT
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CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2026, I served true and correct copies of the following documents:

Debtor's Objection to Motion for Relief from Automatic Stay (ECF No. 172)
Debtor's Objection to Motion for Co-Debtor Relief (ECF No. 172)
Supplemental Declaration of Brian Goodman

by depositing the same in the United States Mail, first-class postage prepaid, addressed as follows:

Andrew M. Dudley
Trustee
P.O. Box 429
Brunswick, ME 04011
207-725-1300

Jennifer L. Joubert
Barton Gilman LLP
One Financial Plaza, 18th Floor
Providence, RI 02903
401-273-7171


Brian Goodman

Debtor, pro se
Dated: January 29, 2026